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15 Attorneys for Defendant

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 THERESA M. WEESNER,)
19 v.) Case No. 2:16-cv-02018-RFB-PAL
Plaintiff,)
20) **JOINT STIPULATION AND [PROPOSED]**
CAROLYN W. COLVIN,)
21 Acting Commissioner of Social Security,) **ORDER FOR EXTENSION OF TIME TO FILE**
22) **DEFENDANT'S NOTICE OF VOLUNTARY**
Defendant.) **REMAND OF THE CASE OR CROSS-**
23) **MOTION TO AFFIRM**
24) **(First Extension Request)**
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26

1 Plaintiff Theresa M. Weesner (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an
3 extension of time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
4 Affirm by thirty days from the current deadline of January 6, 2017 to **February 6, 2017**, with all other
5 dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly. This
6 is Defendant's first request for an extension.

7 Good cause exists to grant Defendant's request for extension. Defendant respectfully requests
8 additional time to adequately review the record, assess and evaluate Plaintiff's arguments. Good cause
9 also exists because counsel for Defendant (Counsel) was on scheduled leave for the holidays and is
10 also expected to be out of the office from December 30, 2016 to January 3, 2017. Counsel needs
11 additional time due to workload issues and current scheduling conflicts to properly respond to the
12 issues Plaintiff raised in her Motion.

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1 Defendant makes this request in good faith with no intention to unduly delay the proceedings.
2 Plaintiff has no objection and has stipulated to the requested relief.

3 Respectfully submitted this 29th day of December 2016,
4

5 Date: December 29, 2016

6 By: /s/*Howard Olinsky
Howard D. Olinsky
*by email authorization on 12/27/16
7 Attorney for Plaintiff

8 Date: December 29, 2016

9 DANIEL G. BOGDEN
United States Attorney
10 HOLLY A. VANCE
Assistant United States Attorney

11 By: /s/ Roya Massoumi
12 ROYA MASSOUMI
Special Assistant United States Attorney

13 Of Counsel:
14 TINA L. NAICKER
15 Assistant Regional Counsel
Attorneys for Defendant

17 **[PROPOSED] ORDER**

18 For good cause appearing therein, IT IS HEREBY ORDERED that the Joint Stipulation for
19 Extension of Time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
20 Affirm is GRANTED. Defendant shall file its response to Plaintiff's Motion on or before February 6,
21 2017. All other deadlines shall be extended accordingly.

22 **IT IS SO ORDERED.**

24 Dated: December 30, 2016

25 
26 THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, ROYA MASSOUMI, certify that the following individual was served with a copy of the
JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE
DEFENDANT'S NOTICE OF VOLUNTARY REMAND OF THE CASE OR CROSS-
MOTION TO AFFIRM on the date and via the method of service identified below:

CM/ECF:

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Respectfully submitted this 29th day of December 2016,

/s/ Roya Massoumi
ROYA MASSOUMI
Special Assistant United States Attorney

OF COUNSEL:
TINA L. NAICKER
Assistant Regional Counsel, Region IX